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March 11, 2020

**BY ECF**

Honorable Lewis J. Liman  
United States District Court  
Southern District of New York  
500 Pearl Street, Room 701  
New York, NY 10007

Re: *King, et al. v. Wang et al.*, Case No. 1:14-cv-07694-LJL

Dear Judge Liman:

We write on behalf of the Defendants Andrew Wang and Shou-Kung Wang, with the consent of counsel for Plaintiff Yien-Koo King, to request an extension of deadlines to file opposition and reply briefs to the parties' summary judgment motions, which were filed on February 14, 2020. The parties jointly request that the March 16 deadline to file opposition briefs be extended to March 23, and the March 23 date for the parties to file reply briefs be extended to April 15.

There is good cause to grant the parties' request. The parties have scheduled a mediation for April 8, 2020 and request this extension, in part, to allow time to prepare for and hold the mediation and to engage in settlement discussions in advance of the mediation. Further, the depth and scope of the parties' summary judgment motions require extensive responses which also warrant the requested extension.

Various deadlines in this matter were previously extended by the Court that affected deadlines to file dispositive motions. On July 30, 2019, Judge Keenan granted a request by the Defendants to extend the initial August 5, 2019 deadline to file dispositive motions to December 20, 2019 to allow for expert discovery, which had not yet commenced, to be completed. (Dkt. 184.) On September 4, the Court granted a request by Plaintiff, with consent of Defendants, to extend the schedule for the exchange of expert reports and depositions, which resulted in movement of the deadline to file dispositive motions to January 17, 2020. (Dkt. 186.) On January 13, 2020, the Court granted a joint request to extend the deadline to complete expert

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depositions when Defendants' expert was unavailable due to illness, and extended the deadline to submit dispositive motions to February 14, 2020. (Dkt. 191.)

Accordingly, the parties jointly request that the Court issue an order:

- 1) Extending the time to submit oppositions to summary judgment motions to March 23, 2020; and
- 2) Extending the time to submit reply briefs to April 15, 2020.

The parties are eager to end this litigation, and respectfully submit that the requested extensions will facilitate resolution of the matter. Counsel are available for a telephonic or in-person conference at the Court's convenience should Your Honor wish to discuss.

Respectfully submitted,

*/s/ Thomas Kelly*  
Thomas Kelly

cc: All counsel of record (by ECF)